

Your
Seattle
City Light

Memorandum



DATE : March 25, 1980
TO : L. Joe Miller
FROM : Peter Willing *fw*
SUBJECT: PCB Capacitors Disposal

In the original EPA regulations on PCB Disposal and Marking (February 17, 1978), January 1, 1980, was established as a critical date after which PCB capacitors could no longer be disposed of in chemical waste landfills. Instead, they would have to be incinerated at an EPA-licensed facility. Since January 1, 1980, has come and gone and EPA has yet to license such an incinerator, EPA recently permitted disposal of PCB capacitors in chemical waste landfills until March 1, 1981. By that time EPA expects to have licensed a PCB incinerator in Arkansas and possibly one in Texas. So far, no one in the northwest has made any moves to establish such a facility.

City Light's practice has been to ship our PCB capacitors, transformers and spill clean-up residuals to Wescon, a chemical waste landfill in Murphy, Idaho. The alternative disposal option is a Chem Nuclear facility in Arlington, Oregon, which is simply a glorified storage shed. Chem Nuclear will ship all of their stored material to an incinerator, when approved. Disposal costs at Wescon average \$.06/lb. compared to \$.114/lb. at Chem Nuclear.

Given this significant difference in disposal costs, it seems clear that City Light should take advantage of these bargain rates to dispose of as many PCB capacitors as possible in the next year. Although we have no guarantee that Wescon's rates will remain constant, Chem Nuclear's rates have been increasing steadily. They are essentially gambling since incineration costs are presently unknown.

If an accelerated PCB capacitor disposal program is initiated, as we recommend, it would be advantageous to begin removing the pole-top PCB capacitors first, rather than large PCB capacitors banks in major substations. These pole-top capacitors present a serious threat to the aquatic environment since any spill due to a ruptured canister can easily end up in a storm sewer and eventually Puget Sound. PCB is toxic to primary producers at concentrations as low as 1 ppb and, as we know, bioaccumulates at an extraordinary rate.

Please give this matter some serious thought. Bill Riley is available (X3568) for further background information, if you like.

WR:js

cc: Murray	Rockey	Riley
Recchi	Sickler	OEA (3)
Mandapat	D.Young	File

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